

Mr. Felipe Marcus
In Propria Persona
2500 South Abilene Street
Aurora, Colorado 80044

1:20-cv-00316-JLS Marcus v.
City of Buffalo, et al.,.

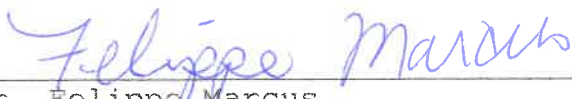
Clerk of the Court
United States District Court
304 United States Courthouse
68 Court Street
Buffalo, New York 14202

To Whom It May Concern:

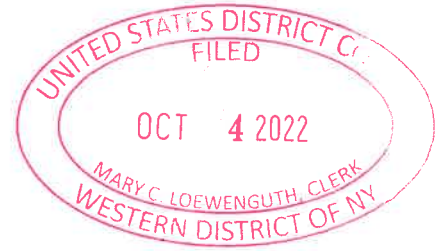
All happiness to you. Please find an original copy of the following document, that I respectfully request you file with this Honorable Court:

1. PLAINTIFFS' EXPERT WITNESSES

Sincerely,



Mr. Felipe Marcus



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

FELIPPE MARCUS,

Plaintiff,

vs.

CITY OF BUFFALO, et al.,.

Defendant(s)

1:20-cv-00316-JLS

Honorable: John L. Sinatra Jr.

PLANTIFFS' EXPERT WITNESSES

NOW COMES, Plaintiff FELIPPE MARCUS, pursuant to this Honorable Courts' scheduling order of February 1, 2022, respectfully submitts' his expert witness list.

1. FORENSIC PURSUIT
The Pursuit of Electronic Evidence

Angela Malley, ACE, CBE
Denver, Colorado 802005

On July 13, 2021, Forensic Pursuit was provided video file 001 along with its player, Genetec Video Player, on a CD, Forensic working copies of the contents of the CD were created for all analysis.

The Genetec Video Player opens the video, displaying three cameras labeled "Cam 26 Group Holding Cell C-12 Cam," Cam 30 Male Holding Facing 57," and "Cam 29 Northeast Holding Area Cam." The timelines for "Cam 30" and "Cam 29" have clear breaks int he timeline where sections of video have been readacted. THis is commonly done when exporting video and producing from DVR systems

to protect the privacy of individuals not involved in the case.

The video is stored in a proprietary format, g64x, which is specific to its proprietary player, it will not open in common video players or editing software, and no evidence of past production software was found in the hex data or metadata of the file.

Mr. Marcus identified three areas of interest at 11:57:14PM, 12:34:29AM and 12:34:58PM, described in greater detail below:

- 11:57:14PM: The officer appears to have something in his hand.
- 12:34:29AM: There is a break in the timeline
- 12:34:58PM: The officer appears to be swinging his arm.

Screenshots were captured from the player between 11:57:12:55.551PM and 11:57:15.148PM from "Cam 26 Group Holding Cell C-12 Cam" and for 12:34:56.029AM through 12:35:04.035 AM from "Cam 29 Northeast Holding Area Cam." The screenshots were provided in full view, including the player and timestamps, in cropped video, and in zoomed view. The break in the timeline is an area that has been redacted.

Please let me know if there are any questions.

Regards,

Angela Maalley, ACE, CBE
Forensic Pursuit
303-495-2082

On August 27th, Mr. Marcus supplied three timecode locations depicting a silver object and a red beam of light. Screenshots were taken of these timecode locations as well as slightly before and after. The timecodes were as follows:

- O 11:56:31:262 - red beam of light
- O 11:57:16:526 - officer with silver object in hand
- O 11:01:56.640 - red beam of light in cell

Plaintiff's other expert is:

PHYSICIAN - SIVALINGAM, DEVAMOHAN MD
ERIE COUNTY MEDICAL CENTER
462 Grider Street
Buffalo, New York 14215
(716) 898-3388

He can testify to the care provided Plaintiff, and the injuries to Plaintiff.

Thus, I respectfully file my list.

Sincerely,

Mr. Felipe Marcus
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To Whom It May Concern:

All happiness to you. Please find an original copy of the following document, that I respectfully request you file with this Honorable Court:

1. PLAINTIFFS' EXPERT WITNESSES
2. PLAINTIFFS' PROPOSED OUT OF COURT SETTLEMENT;
3. PLAINTIFFS' REQUEST FOR ADMISSIONS'.
2. Proof of Service.

Sincerely,

Felipe Marcus

Dated:

10.03-2022

Mr. Felipe Marcus
In Propria Persona

cc: file FM

Mr. Felipe Marcus
In Propria Persona
2500 South Abilene Street
P.O. Box 441058
Aurora, Colorado 80044

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David M. Lee
Assistant Corporation Counsel
65 Niagara Square, 11th Floor
Buffalo, New York 14202
dlee@city-buffalo.com

Dear Mr. Lee,


All happiness to you. Please find PLAINTIFFS' EXPERT WITNESSES LIST, PLAINTIFFS' PROPOSED OUT OF COURT SETTLEMENT; and PLAINTIFFS' REQUEST FOR ADMISSIONS', that I ask that you respectfully answer, within the time limit of discovery. Also, have you any idea when you will be responding to my first set of interrogatories, and motion for production of document, that are over thirty days old.

Finally, have you considered any answer to my other proposed out of court settlement? Also, I have enclosed another offer. I trust that you will be providing answers' to these questions' soon.

Thank you for your time and attention to this matter. If you should have any further questions' you can call me, or wrote again. Thank you!!!

Very truly yours,

Dated: 10-03, 2022



Mr. Felipe Marcus
In Propria Persona

FELIPE MARCUS
2500 S. Arlene St.
P.O. Box 441058
Aurora, CO. 80044
Tel # 720-234-0067

20-cv-316

Clerk of the Court
2 NIAGARA SQ
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(716) 551-1700